Hearing Date and Time: October 19, 2006, 10:00 a.m. Objection Deadline: October 12, 2006, 4:00 p.m.

COVINGTON & BURLING LLP

1330 Avenue of the Americas New York, New York 10019-5400 (212) 841-1000 Aaron Marcu (AM-6309) Susan Power Johnston (SJ-9386)

Foreign Trade and Special Corporate Committee Counsel to the Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

Case No. 05-44481 (RDD)

Debtors.

(Jointly Administered)

NOTICE OF HEARING ON SECOND INTERIM APPLICATION OF COVINGTON & BURLING LLP,
FOREIGN TRADE AND SPECIAL CORPORATE COMMITTEE LEGAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM FEBRUARY 1, 2006 THROUGH MAY 31, 2006

PLEASE TAKE NOTICE that on October 19, 2006 at 10:00 a.m., Covington & Burling LLP, as foreign trade and special corporate committee legal counsel to the above-captioned debtors and debtors-in-possession, will move before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, in Courtroom 610 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, for entry of

Filed 07/31/06 Entered 07/31/06 22:33:59 Main Document 05-44481-rdd Doc 4793 Pq 2 of 2

an order approving its second interim application for allowance of compensation for professional

services rendered and reimbursement of expenses incurred from February 1, 2006, through May

31, 2006 (the "Compensation Period") totaling \$551,937.00, and for reimbursement of its

actual and necessary expenses incurred during the Compensation Period totaling \$22,773.74.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed

order must be made in writing and delivered to Judge Drain's chambers and the undersigned so

as to be received not later than 4:00 p.m. on October 12, 2006. If no objections are received by

that time, the order may be entered.

Dated: July 31, 2006

COVINGTON & BURLING LLP

By: /s/ Susan Johnston

Aaron R. Marcu (AM-6309) Susan Power Johnston (SJ 9386)

1330 Avenue of the Americas New York, NY 10019-5400

(212) 841-1000

Foreign Trade and Special Corporate Committee Counsel to the Debtors and

Debtors-in-Possession

- 2 -